

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ORRIN BACOTE,

Plaintiff,

-against-

RIVERBAY CORPORATION, et. al.,

Defendants
-----X

16 Civ. 1599 (GHW)

**NOTICE OF
MOTION
TO PRECLUDE
DEFENDANTS'
EXPERT**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Motion to Preclude Defendants' Expert, the Declaration of Gerald M. Cohen, dated May 10, 2017, and the exhibits annexed thereto, plaintiff ORRIN BACOTE, by his counsel Cohen & Fitch LLP will move this Court at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, before the Honorable Gregory H. Woods, United States District Judge, for an Order:

1. Precluding Defendants' Expert, Dr. Kevin Toosi; and,
2. For such other and further relief as may be just and proper.

Dated: New York, New York
May 10, 2017

Yours, etc..

By: _____/S_____
GERALD M. COHEN
ILYSSA FUCHS
JOSHUA FITCH
COHEN & FITCH LLP
Attorneys for Plaintiff

233 Broadway, Suite 1800
New York, N.Y. 10279
(212) 374-9115

TO: Horace Rhoden, Esq.
Vanessa Corchia, Esq.
Armeienti, DeBellis, Gugliemo & Rhoden, LLP
39 Broadway, Suite 520
New York, New York 10006-3034